

Questions/Concerns regarding the former WWW Tannery Site, Rockford, MI  
 To MDEQ Grand Rapids  
 Water Resources and Remediation Division

**1. RUM CREEK covered over in late 2015.** Why has WWW covered over a substantial portion of Rum Creek with a new cement slab?

- Did they receive a permit to do this work? Did they receive approval to do this work? If so, when?
- What is their reason behind covering over Rum Creek with a large cement slab?
- What is the DEQ's opinion of this action taken by Wolverine?

**SEE ATTACHED PHOTOS**

**2. Ammonia and Hides** Ammonia is the big issue as it is the only chemical consistently in the down gradient wells. Is this why WWW trying a "novel" approach for unionized ammonia? Is WWW/Rose & Westra trying to "muddy the waters" by focusing on un-ionized ammonia rather than total ammonia?

- Total ammonia should be measured—not ionized ammonia.
- There is no statistical evidence that the total ammonia levels are going down.
- It is the un-ionized ammonia which is toxic, and it is toxic to fish. It does no good to measure un-ionized ammonias in the wells. It is only when ammonia is discharged to the stream, and factors such as PH and temperature come into play that the toxicity comes into play.
- They are trying to "muddy the waters" by focusing on un-ionized ammonia rather than total ammonia.

**HIDES:** The presence of hides all up and down the river bank and on the site is not "sporadic." The presence of these hides is a very likely cause of the high ammonia levels. Also, buried hides could be contributing to the high levels of PFOC found in fish.

**3. Untested areas/ Important analytes not included in testing**

The oversight group maintains that there has been *insufficient* follow-up testing in the **four source areas of contamination** documented in the CERCLA Report of 2012. Additionally, the oversight group would like to discuss with the DEQ other analytes they believe merit further testing.